

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-106-A

IN RE:)	
)	
Actions in Response to COVID-19)	NOTICE OF APPEARANCE
)	
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YOU WILL PLEASE TAKE NOTICE that **Charles L.A. Terreni** gives notice of appearance of counsel on behalf of **Electric Cooperatives of South Carolina, Inc.**, in the above-captioned matter.



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Columbia, South Carolina
May 22, 2020



May 21, 2020

The Honorable Jocelyn G. Boyd
Executive Director / Chief Clerk
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 110
Columbia, South Carolina 29201

Re: Docket No. 2020-106-A. Actions in Response to COVID-19. Comments in response to Order No. 2020-372

Dear Ms. Boyd:

On May 14, 2020, the Commission requested comments on measures that could be taken to mitigate the economic effects of the COVID19 pandemic on the state's consumers. I write to share the perspective of the state's member owned electric cooperative as they confront similar issues.

The Electric Cooperatives of South Carolina, Inc. ("ECSC") is the statewide service and trade association for electric cooperatives in the state. Our members are 19 consumer-owned electric cooperatives, one wholesale power supply cooperative, and one materials supply cooperative. Together, they operate the largest electric distribution system in the state. Over 1.5 million South Carolinians, representing 800,000 accounts in all 46 counties, use electricity from electric cooperatives. ECSC provides member cooperatives with communications and legal services, personnel training, safety programs, and public and government relations.

Each utility is unique, but ECSC believes that, to the extent possible, South Carolina's consumers benefit from a clear and unified message regarding utility policies during this crisis. To that end, electric cooperatives have maintained ongoing communications with the state's investor owned utilities and the Office of Regulatory Staff during the pandemic. For instance, the electric cooperatives voluntarily joined their investor owned counterparts in answering the Commission's order to suspend disconnections for non-payment. It was the right thing to do when so many South Carolinians were laid off from their jobs and had their livelihood disrupted.

As the economy reopens, and the Commission has vacated its order to suspend disconnection of service, electricity providers continue to face similar challenges. Many electricity consumers have sizeable unpaid balances accrued while disconnection of service was suspended. Utilities will need to work with consumers to arrange terms for these balances to be paid. All ECSC's member electric cooperatives are offering extended payment plans, sometimes in conjunction with paired prepay options for future use, to members with unpaid balances. When appropriate, we also refer consumers to community action agencies, often even helping them complete requests for assistance.

Striking the right balance between easing the burden on customers who need it while not unreasonably increasing the burden on other customers is difficult. Maximizing the flexibility of utilities to work out payment arrangements with consumers on a case-by-case basis is key to striking that balance. Therefore, we do not recommend the Commission order the forgiveness of late payment fees across the board. Forgiveness of late payment fees can be a helpful incentive for utilities to encourage customers to resolve their unpaid balances.

On-line payment fees, credit card processing fees, and returned check charges reflect actual costs incurred by the electrical utility. In our case, if they are not paid by the consumer who causes them, other cooperative members will bear the burden. Our cooperatives are therefore reluctant to waive these fees—especially returned check charges—but sometimes may consider it when negotiating a consumer's payment plan.

ECSC commends the Commission for starting this important discussion. The COVID19 pandemic is an unprecedented challenge to South Carolina and its public utilities. Uncertainty remains as South Carolina resumes economic activity. We cannot rule out that further consumer protections may be necessary if there is a resurgence of COVID19 cases. Regulatory flexibility and an ongoing exchange of information among public utilities is critical in this environment.

Thank you for your consideration of these comments.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Mike Couick", written in a cursive style.

Mike Couick
President and Chief Executive Officer

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OF SOUTH CAROLINA
DOCKET NO. 2020-106-A
CERTIFICATE OF SERVICE

I, **CARL E. BELL**, hereby certify that I have, on this **22nd day of May 2020**, served the **Notice of Appearance and Comments of Electric Cooperative of South Carolina, Inc.**, by Efiling with the **South Carolina Public Services Commission** and the parties by email to the addresses listed below:

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